

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

SHAWN DRUMGOLD, Plaintiff	)	C.A. NO. 04-11193NG
	)	
	)	
v	)	
	)	
TIMOTHY CALLAHAN, ET AL.	)	
Defendant(s)	)	
	)	

**MOTION TO EXTEND TIME FOR PLAINTIFF TO DESIGNATE EXPERT WITNESSES**

NOW COMES the Plaintiff and moves this court to extend the time for designation of Plaintiff's experts from May 15, 2006 to June 15, 2006 and to extend for 30 days the Defendant's time for designation of expert witnesses. In support thereof, the Plaintiff says:

Plaintiff served a First Request for Production of Documents on the City of Boston on February 16, 2006. The Request seeks the basic documents necessary for an expert to prepare an opinion in connection with this case.

At the request of the City of Boston, the Plaintiff has agreed to several extensions of the time for responding to the Document Request. Documents are currently promised to be delivered by approximately May 17, 2006, although they have not been received to date.

The Plaintiff cannot effectively prepare expert testimony until he has received and reviewed the document requested in the First Request for Production of Documents.

This is the first request for extension of time for designating experts by the Plaintiff.

Respectfully submitted,  
Attorney for Plaintiff,  
Shawn Drumgold

/s/ Rosemary Curran Scapicchio

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Respectfully submitted,  
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